

1 PHILLIP A. TALBERT  
2 Acting United States Attorney  
3 KEVIN C. KHASIGIAN  
4 Assistant United States Attorney  
5 501 I Street, Suite 10-100  
Sacramento, CA 95814  
Telephone: (916) 554-2700

5 Attorneys for the United States

6

7

8 IN THE UNITED STATES DISTRICT COURT

9 EASTERN DISTRICT OF CALIFORNIA

10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 APPROXIMATELY \$19,980.00 IN  
U.S. CURRENCY,

15 APPROXIMATELY \$15,000.00 IN  
U.S. CURRENCY, AND

16 APPROXIMATELY \$4,335.00 IN  
U.S. CURRENCY,

17 Defendant.

2:21-MC-00213-MCE-CKD

18

19 STIPULATION AND ORDER EXTENDING TIME  
FOR FILING A COMPLAINT FOR FORFEITURE  
AND/OR TO OBTAIN AN INDICTMENT  
ALLEGING FORFEITURE

20 It is hereby stipulated by and between the United States of America and potential claimant Jason  
21 Brewer (“claimant”), by and through their respective counsel, as follows:

22 1. On or about June 4, 2021, claimant filed a claim in the administrative forfeiture proceeding  
23 with the United States Postal Inspection Service (“USPIS”) with respect to the Approximately \$19,980.00  
24 in U.S. Currency, Approximately \$15,000.00 in U.S. Currency and Approximately \$4,335.00 in U.S.  
25 Currency (hereafter “defendant currency”), which were seized on March 17, 2021.

26 ///

27 ///

28 ///

2. The USPIS has sent the written notice of intent to forfeit required by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a claim to the defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than claimant has filed a claim to the defendant currency as required by law in the administrative forfeiture proceeding.

3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to forfeiture within ninety days after a claim has been filed in the administrative forfeiture proceeding, unless the court extends the deadline for good cause shown or by agreement of the parties. That deadline was September 2, 2021.

4. By Stipulation and Order filed September 1, 2021, the parties stipulated to extend to October 1, 2021, the time in which the United States is required to file a civil complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to forfeiture.

5. By Stipulation and Order filed October 1, 2021, the parties stipulated to extend to November 1, 2021, the time in which the United States is required to file a civil complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to forfeiture.

6. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to December 1, 2021, the time in which the United States is required to file a civil complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to forfeiture.

7. Accordingly, the parties agree that the deadline by which the United States shall be required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to forfeiture shall be extended to December 1, 2021.

Dated: 11/1/21

PHILLIP A. TALBERT  
Acting United States Attorney

By: /s/ Kevin C. Khasigian  
KEVIN C. KHASIGIAN  
Assistant United States Attorney

1 Dated: 10/29/21

2 /s/ Valery Nechay  
3 VALERY NECHAY  
4 Attorney for potential claimant  
5 Jason Brewer  
6 (Signature authorized by phone)

7 IT IS SO ORDERED.  
8

9 Dated: November 8, 2021

10   
11 MORRISON C. ENGLAND, JR.  
12 SENIOR UNITED STATES DISTRICT JUDGE  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28